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*Special Counsel to Richard A. Marshack,
Chapter 11 Trustee*

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA - SANTA ANA DIVISION

In re:

THE LITIGATION PRACTICE
GROUP P.C.,

Debtor.

Case No. 8:23-bk-10571-SC

Chapter 11

Adv. Proc. No. 8:23-cp-01148-SC

**JOINT STIPULATION FOR
EXTENSION OF DEADLINES IN
SCHEDULING ORDER**

RICHARD A. MARSHACK,
Chapter 11 Trustee,
Plaintiff,

v.

JGW SOLUTIONS LLC,
Defendant.

1 TO THE HONORABLE SCOTT C. CLARKSON, UNITED STATES
2 BANKRUPTCY JUDGE, AND ALL INTERESTED PARTIES:

3 This Stipulation (“Stipulation”) is entered into by and between Plaintiff Richard
4 A. Marshack, the Chapter 11 Trustee (“Trustee” and/or “Plaintiff”) for the bankruptcy
5 estate (“Estate”) of debtor The Litigation Practice Group PC (“Debtor” or “LPG”)
6 and liquidating trustee of the LPG Liquidation Trust in the above captioned
7 bankruptcy and Defendant JGW Solutions, LLC (“JGW” and together with Trustee
8 “Parties”), pursuant to LBR 7016-1(a)(5), hereby request that the Court modify the
9 deadlines set forth in the previously entered scheduling order.

10 **RECITALS**

11 1. The current dispositive motion deadline is November 18, 2024.

12 2. On July 29, 2024, Trustee served JGW with Interrogatories.

13 3. On August 27, 2024, JGW requested a two-week extension to respond
14 to Trustee’s Interrogatories due to illnesses within counsel’s office.

15 4. The Parties submitted a Stipulation seeking to extend the fact discovery
16 deadline to accommodate as the Parties have diligently and amicably worked together
17 throughout discovery, and Trustee did not object to providing JGW with the extension
18 to respond to the outstanding Interrogatories.

19 5. This Honorable Court agreed to extend the deadlines and entered the
20 Stipulation submitted by the Parties.

21 6. The Trustee received JGW’s responses to Trustee’s Interrogatories on
22 September 13, 2024.

23 6. The Trustee is currently preparing a Motion for Summary Judgment to
24 be heard by this Honorable Court.

25 7. The Trustee’s Motion for Summary Judgment will incorporate JGW’s
26 responses to Trustee’s Interrogatories.

27 8. The Trustee is seeking additional time to evaluate and incorporate
28 JGW’s thorough responses to Trustee’s Interrogatories into its Motion for Summary

Judgment. Because the current dispositive motion deadlines would not permit the Trustee to evaluate JGW's responses to Interrogatories and incorporate into its Motion for Summary Judgment within the deadline for dispositive motions to be heard, the Parties agreed to modify the existing deadlines in the previously entered Stipulation.

9. The Parties are not seeking to extend any other deadlines previously stipulated to.

WHEREFORE, the Parties stipulate as follows:

1. The dispositive motion deadline will be extended through and including December 13, 2024.

2. All other deadlines previously stipulated to among the Parties remain as calendared. Specifically,

a. The pre-trial stipulation deadline is January 13, 2025;

b. The pre-trial conference is February 5, 2025 at 11:00 a.m.

Dated: October 4, 2024

DINSMORE & SHOHL LLP

By: /s/ Sarah S. Mattingly

Christopher B. Ghio

Christopher Celentino

Yosina M. Lissebeck

Sarah S. Mattingly (pro hac vice)

Special Counsel to Plaintiff

Richard A. Marshack, the

Chapter 11 Trustee for the

bankruptcy estate of debtor The

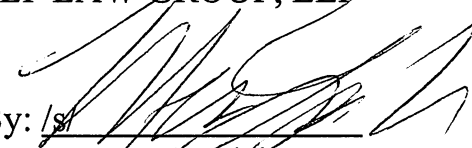
Litigation Practice Group PC

and liquidating trustee of the

LPG Liquidation Trust

1 Dated: October 4, 2024

FLP LAW GROUP, LLP

2
3 By: 

4 Marc A. Lieberman

5 *Counsel for Defendant JGW*
6 *Solutions, LLC*
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